

Clark Stith

From: Bradley T. Hunsicker <BHunsicker@markuswilliams.com>
Sent: Tuesday, July 16, 2024 5:44 PM
To: Clark Stith
Cc: Robert Walker; Peter Lewis; Lacey Bryan
Subject: RE: Request that Best of the West Productions LLC file adversary to pursue fraudulent transfer claims

Clark –

I wanted to send you an email letting you know that I've received your email below and plan to respond substantively by the end of the week. I'm out tomorrow, and then will be spending all day Thursday working on the Plans for these cases. I should be able to respond on Friday.

Brad

Bradley T. Hunsicker
Markus Williams Young & Hunsicker LLC
2120 Carey Avenue, Suite 101
Cheyenne, WY 82001
307-778-8178
www.markuswilliams.com



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From: Clark Stith <clarkstith@wyolawyers.com>
Sent: Monday, July 15, 2024 11:51 AM
To: Bradley T. Hunsicker <BHunsicker@markuswilliams.com>
Cc: Robert Walker <robert@wyocounsel.com>; Peter Lewis <Peter.Lewis@solidcounsel.com>
Subject: Request that Best of the West Productions LLC file adversary to pursue fraudulent transfer claims

Brad,

On behalf of creditor John A. McCall, I am requesting that Best of the West Productions, LLC ("Productions") take appropriate action to pursue fraudulent transfer claims as against BOTW Holdings, LLC, Best of the West Arms, LLC, Best of the West Ammo, LLC and any other entities to which Productions transferred assets without receiving fair value.

This request is based on the statement of financial affairs and the operating report for Productions, which indicate that Productions has no inventory, and other than \$3k in a checking account, no other assets and no income. As Productions was the original company that owned all of the inventory, assets and goodwill, it appears that at some point it transferred its assets to third parties for less than fair value.

Thank you.

Best regards,

Clark Stith
505 Broadway
Rock Springs, Wyoming 82901
307-382-5565 office
307-389-7735 cell
W.S.B. NO. 6-3176

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From: Bradley T. Hunsicker <BHunsicker@markuswilliams.com>
Sent: Tuesday, July 16, 2024 6:43 PM
To: Clark Stith <clarkstith@wyolawyers.com>
Cc: Robert Walker <robert@wyocounsel.com>; Peter Lewis <Peter.Lewis@solidcounsel.com>;
Lacey Bryan <lbryan@markuswilliams.com>
Subject: RE: Request that Best of the West Productions LLC file adversary to pursue fraudulent transfer claims

CAUTION: EXTERNAL EMAIL

Clark –

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Cc: Robert Walker <robert@wyocounsel.com>; Peter Lewis <Peter.Lewis@solidcounsel.com>
Subject: Request that Best of the West Productions LLC file adversary to pursue fraudulent transfer claims

Brad,

On behalf of creditor John A. McCall, I am requesting that Best of the West Productions, LLC ("Productions") take appropriate action to pursue fraudulent transfer claims as against BOTW

Clark Stith

From: Bradley T. Hunsicker <BHunsicker@markuswilliams.com>
Sent: Friday, July 26, 2024 3:18 PM
To: Clark Stith
Cc: Lacey Bryan
Subject: RE: Request that Best of the West Productions LLC file adversary to pursue fraudulent transfer claims

Clark –

We have diligently been investigating this matter and it has proven to be more difficult than expected. The primary reason is that the current owners have only recently been involved with the business and the history of the entities is not crystal clear from the documents we have reviewed. I have follow-up questions pending with my client that hopefully shed more light onto the issue. We also have the 2-year and 4-year SOL issue. And then we have the tardy claim issue which further complicates matters as your client may not stand to gain anything even if fraudulent transfer claims exist.

Let me know your thoughts on how best to proceed.

Brad

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From: Clark Stith <clarkstith@wyolawyers.com>
Sent: Friday, July 26, 2024 12:13 PM
To: Bradley T. Hunsicker <BHunsicker@markuswilliams.com>
Subject: Fwd: Request that Best of the West Productions LLC file adversary to pursue fraudulent transfer claims

Brad, I wanted to follow up on my July 15 request that Best of the West Productions LLC pursue fraudulent transfer claims as against Best of the West Arms, LLC, Best of the West Ammo, LLC and any